



How and Why to Promote Schoolwide Free Meals Using the Community Eligibility Provision

Nora Gordon, Georgetown University

Krista Ruffini, Georgetown University McCourt School of Public Policy

The Community Eligibility Provision is a relatively new way for low-income schools and districts to receive federal subsidies that cover up to the entire cost of school meals for *all* their students – not just low-income ones. Research shows schoolwide free meals improve student achievement and reduce suspensions, yet nearly half of all eligible schools do not participate in this program. States can adapt their programs to encourage local participation.

How Does the Community Eligibility Provision Work?

The Community Eligibility Provision allows high-poverty schools and districts to offer free school breakfasts and lunches to all students in schools that qualify and choose to participate, *regardless of an individual child's family income*. This is a marked contrast to other districts, where schools determine whether students receive a free or reduced-price meal using parent-reported income on forms sent home from school. Students with family income below 130 percent of the federal poverty line are eligible for free meals, students between 130 and 185 percent of poverty are eligible for heavily-subsidized meals, and students above 185 percent of poverty must pay full price. Children who are known to have low-incomes because their families participate in other income assistance programs — most commonly the Supplemental Nutrition Assistance Program (SNAP, formerly food stamps) — are “categorically eligible,” or “directly certified,” and receive free meals even if their parents do not fill out the forms.

The federal government reimburses schools at a set rate for every free, reduced, and paid meal served. In the 2018-2019 school year, these rates were \$3.31, \$2.91, and \$0.31 per free, reduced-price, and paid lunch respectively. Without the Community Eligibility Provision, schools must keep track of how many meals are served in each category and submit this information to state education agencies, which then submit the information to the Department of Agriculture.

The Community Eligibility Provision simplifies this process by subsidizing meal costs for all students in participating schools or districts. Participation requires at least 40 percent of students to be categorically-eligible for school meals — and for the school or local school district to opt in to the program. The federal government reimburses participating schools at the free-meal price for 1.6 times the share of categorically eligible students, up to a maximum of 100 percent. Any remaining meals are reimbursed at the paid meal rate. This means participating schools with 62.5 percent of students categorically eligible receive the full federal subsidy for all meals for all students.

The provision is not the only option for offering schoolwide free meals. Some districts have financed universal programs from local resources (these are typically restricted to breakfasts). Under Provisions 1-3, schools can report data on student eligibility less frequently, and be reimbursed at the same rate for up to four years. But compared to these earlier programs, the Community Eligibility Program offers more generous reimbursement for most schools.

Schoolwide Free Meals Improve Educational Outcomes

A growing literature finds that schoolwide free meals programs lead to improved academic and non-academic outcomes for some students. Researchers have found allowing all students to receive a free school meal increases breakfast and lunch consumption, improves test scores, and reduces the share of elementary school students who are suspended.

Since its introduction, the Community Eligibility Provision has grown in popularity. In the 2016-2017 school year, 9.7 million students had access to free school meals through the provision, and an estimated 55 percent of eligible schools participated. While this share has increased over time, school participation remains well below 100 percent, even among the highest-poverty schools that would receive full reimbursement.

Once districts participate, parents have little incentive to return the official forms used to determine their child's eligibility. Historically, districts used those data to distribute Title I funds and states often relied on them to allocated state revenues. An early evaluation of the Community Eligibility Provision pilot states found that eligible schools that were not participating were concerned about the effect of the program on these other funding streams.

What States Can Do

The fraction of eligible schools that participate in the Community Eligibility Provision varies widely across states, from approximately 10 percent in New Hampshire to more than 95 percent in Ohio. There are several steps states can take to promote local take-up of this federal subsidy.

Protect participating districts from funding complications by promoting use of alternate data sources, including simplified household income forms, Medicaid participation, or, where possible, Census data. Districts can use some of these other data sources in allocating Title I funds to their schools, and states can use them to direct state funds to districts. These options are federally-approved and already in use in some states.

Ensure districts are counting all students who are categorically eligible for free meals by drawing on food stamp and Temporary Assistance for Needy Families program participation, but also Head Start and Even Start registries and information on homeless, migrant, runaway, and foster care children. Some districts have already taken this approach: after expanding their student match systems, New York City was able to increase its categorically-eligible share and receive full reimbursement. States participating in the federal demonstration project can use Medicaid participation as well.

Help districts that do not qualify for the maximum reimbursement districtwide understand their options for maximizing federal reimbursements. The Department of Agriculture has published calculators to help

determine which reimbursement option yields the greatest outside revenue.

For example, consider a district with two schools, each with 100 students. School A has a categorical-eligible share of 75 percent. School B has a categorical-eligible share of 55 percent. If these schools participated in the Community Eligibility Provision as a combined application, they would both receive full reimbursement. In contrast, if they applied separately, School A would receive full reimbursement, but school B would receive full reimbursement for only 88 percent of its meals.

Push for federal law changes to allow states to directly certify students based on Medicaid participation. This is currently a demonstration program with 22 states participating.

Read more **Nora Gordon and Krista Ruffini, “School Nutrition and Student Discipline: Effects of Schoolwide Free Meals,” *National Bureau of Economic Research Working Paper* (2018).**